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March 20, 2013

VIA FACSIMILE

Honorable Harold Baer, Jr.
United States District Judge
500 Pearl Street
Chambers 2230
New York, NY 10007**USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 3/21/13**Writer's Direct Contact
212.468.8009
MBMiller@mofa.comRE: Martinez v. Experian Information Solutions, Inc., et al., Case No. 12-cv-5756

Dear Judge Baer:

Defendant LexisNexis Risk Solutions FL, Inc. ("LNRSFL") respectfully requests an extension of time to respond to the First Amended Complaint in the above-captioned action from March 22, 2013 to April 5, 2013. LNRSFL has not previously requested any extension in this case.

LNRSFL seeks this two-week extension because it was only recently added to the action and served with the First Amended Complaint through the New York Secretary of State. Defendant Experian Information Solutions, Inc. ("Experian") has consented to this extension. Plaintiff's initial complaint, filed on July 26, 2012, did not name LNRSFL as a defendant. On February 14, 2013, Plaintiff filed the First Amended Complaint, which added LNRSFL as a defendant. On March 1, 2013, Plaintiff served the Summons and First Amended Complaint on LNRSFL through the New York Secretary of State, which LNRSFL received on March 8, 2013.

Plaintiff Melinda Martinez ("Plaintiff") has agreed to a one-week extension of LNRSFL's deadline to respond, but objects to a two-week extension due to concerns about the current case calendar. Separately, the Parties will submit a joint letter requesting a modification of the Court's November 15, 2012 Scheduling Order [Dkt. No. 11] due to LNRSFL's recent addition to this case, which we believe will address Plaintiff's concerns regarding the current calendar.

LNRSFL has retained the undersigned counsel and Ronald I. Raether, Jr. of Faruki Ireland & Cox P.L.L. (who intends to seek admission to the Court *pro hac vice*) to represent it in this matter. Counsel have been working diligently to investigate the allegations in this case, but nevertheless request a short extension of the time to respond, to April 5, 2013, in order to prepare LNRSFL's response to the First Amended Complaint.

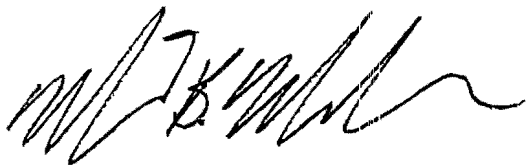
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Respectfully submitted,



Michael B. Miller

cc: All Counsel

① Answer as moved by 4/5/13
② Read my Individual Practice
w/ respect to new party

BA

SO ORDERED:

Harold Baer, Jr., U.S.D.J.

Date: 3/21/13

Endorsement:

1. Answer or move by April 5, 2013.
2. Read my individual practices with regard to new parties.